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26 *Attorneys for the United States*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24
25 400 ACRES OF LAND, more or less,
26 situate in Lincoln County, State of Nevada;
27 and JESSIE J. COX, et al.,

28 Defendants.

Case No. 2:15-cv-01743-MMD-NJK

**STIPULATION TO EXTEND TIME TO
FILE OPPOSITION AND REPLY TO
ECF NO. 545 (First Request)**

1 Pursuant to LR IA 6-1, Plaintiff United States of America and Defendant Sheahan
2 Landowners hereby stipulate to a one-week extension (to December 6, 2019) for the United
3 States to file an opposition to the Sheahan Landowners' Motion, ECF No. 545. The United States
4 and Sheahan Landowners further stipulate to a corresponding one-week extension (from one
5 week to two weeks) for the Sheahan Landowners to file a reply in support of ECF No. 545. In
6 support of this stipulation, the parties state:

7 1. On November 15, 2019, the Sheahan Landowners filed a Motion for Leave to
8 Provide Offer of Proof on the Qualtrics 1 and 2 Surveys Through Live Testimony In Question-
9 And-Answer Format Pursuant to Federal Rules of Evidence Rule 103(c) ("ECF No. 545").

10 2. The current deadline for filing an opposition to ECF No. 545 is November 29,
11 2019, the day after Thanksgiving.

12 3. Counsel for both parties are planning to take time off to celebrate the
13 Thanksgiving Holiday.

14 4. In order to avoid filing during Thanksgiving week, the parties agree to extend the
15 time for the United States to file an opposition to ECF No. 545 to December 6, 2019.

16 5. In light of the one-week extension provided the United States, the parties further
17 agree to a corresponding one-week extension (i.e. from one week to two weeks) for the Sheahan
18 Landowners to file a reply, making the reply deadline December 20, 2019.

19 6. This is the first stipulation for extension of time to file an opposition or reply to
20 ECF No. 545.

21 Respectfully submitted,

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23 **FOR THE UNITED STATES OF AMERICA**

24
25 /s/ Mark C. Elmer
26 EUGENE HANSEN
27 JOHANNA M. FRANZEN
28 ANTHONY GENTNER
MARK C. ELMER
Trial Attorneys
U.S. Department of Justice

1 **FOR THE SHEAHAN LANDOWNERS**

2
3 /s/ Autumn L. Waters

4 KERMITT L. WATERS, Bar No. 2571

5 JAMES J. LEAVITT, Bar No. 6032

6 MICHAEL A. SCHNEIDER, Bar No. 8887

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11 Email: jim@kermittwaters.com

12 *Counsel for Defendant Sheahan Landowners*

13 **IT IS SO ORDERED:**

14 

15 Miranda Du

16 United States District Judge

17
18 Dated: November 21, 2019

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2019, I served the foregoing Stipulation to Extend Time to File Opposition and Reply to ECF No. 545 on all parties who have appeared in this action using the Court's case management/electronic case filing system. In addition, I hereby certify that on November 21, 2019 the United States sent a copy of the foregoing Stipulation to Extend Time to File Opposition to ECF No. 545 via U.S. mail to the following defendants:

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Henderson, NV 89002

John B. Sheahan
Address unknown

Deborah Lynn Sheahan
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Las Vegas, NV 89121

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148 Broadway
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Animal Place
c/o Kim Sturla (Registered Agent)
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165 Lakewood Road
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Amy Sears
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/s/ Mark C. Elmer
MARK C. ELMER